

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**MICHAEL DAVID SILLS and MARY SILLS**)  
Plaintiffs,)  
v.)  
**SOUTHERN BAPTIST CONVENTION,**)  
**a non-profit corporation; et al.,**)  
Defendants.)  
Case No. 3:23-cv-00478  
Judge William L. Campbell, Jr.  
Magistrate Judge Jeffery S. Frensley  
JURY TRIAL DEMANDED

## **MOTION TO WITHDRAW AS ATTORNEY OF RECORD**

Pursuant to Local Rule 83.01(g), Plaintiffs respectfully move this Court to permit the withdrawal of Gary E. Brewer, deceased, of Brewer & Terry, P.C., 1702 West Andrew Johnson Hwy, Morristown, TN 37814, as counsel of record for Plaintiffs Michael David Sills and Mary Sills. As set forth below, there is good cause for this Motion:

1. On March 25, 2025, undersigned counsel received an email from Steve Terry, Mr. Brewer's nephew and long-time law partner at Brewer & Terry, P.C., that Mr. Brewer was not doing well and had just been diagnosed with stage 4 pancreatic cancer the previous week.
2. Counsel immediately forwarded the message to Plaintiff David Sills. *See* email of March 25, 2025, from Katherine B. Riley attached hereto as Exhibit A.
3. Mr. Brewer unfortunately passed away on March 31, 2025. *See* Mr. Brewer's obituary attached hereto as Exhibit B.
4. On April 1, 2025, undersigned counsel received an email from Mr. Terry regarding Mr. Brewer's passing and sent notice to Plaintiffs Mary and David Sills as required by Local Rule

83.01(g). See email of April 1st from Mrs. Riley attached hereto as Exhibit C.

5. Plaintiffs have been and will continue to be represented by Katherine B. Riley<sup>1</sup>, John W. (“Don”) Barrett, and Sterling Aldridge with the law firm Barrett Law Group, P.A., and Kristofer S. Riddle and Shannon M. McNulty with the law firm Clifford Law Offices, P.C.

6. The withdrawal of Mr. Brewer as counsel will not delay any trial or other proceedings in this matter, and, as indicated above, Plaintiffs will continue to be represented by other qualified counsel, some of whom have been representing Plaintiffs since the inception of this case.

Accordingly, Plaintiffs respectfully request that the Court grant this Motion and permit the withdrawal of Gary E. Brewer, of Brewer & Terry, P.C., as counsel of record for Plaintiffs in this matter and further request that no further action be required of him.

Dated: April 21, 2025

Respectfully submitted,

/s/ Katherine B. Riley  
Katherine Barrett Riley (TN Bar #021155)  
John W. (“Don”) Barrett  
Sterling Aldridge  
Barrett Law Group. P.A.  
P.O. Box 927  
404 Court Square  
Lexington, Mississippi 39095  
[kbriley@barrettlawgroup.com](mailto:kbriley@barrettlawgroup.com)  
[dbarrett@barrettlawgroup.com](mailto:dbarrett@barrettlawgroup.com)  
[saldridge@barrettlawgroup.com](mailto:saldridge@barrettlawgroup.com)

Shannon M. McNulty  
Clifford Law Offices, P.C.  
120 N. LaSalle Street, Suite 3600  
Chicago, Illinois 60602  
[smm@cliffordlaw.com](mailto:smm@cliffordlaw.com)

---

<sup>1</sup> Mrs. Riley was admitted to the Tennessee Bar on December 16, 2001 (BPR #021155) and she was admitted to the Middle District of Tennessee on September 11, 2023.

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I, Katherine B. Riley, hereby certify that on April 21, 2025, I served the above and foregoing Motion to Withdraw as Attorney of Record on all counsel of record via the Court's CM/ECF filing system.

/s/ Katherine B. Riley  
Katherine B. Riley